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*Attorney for Plaintiff BMF Wallets, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BMF WALLETS, LLC,	)	<b>Case 2:21-cv-02181-RFB-DJA</b>
	)	
Plaintiff,	)	
	)	<b>STIPULATED MOTION AND</b>
v.	)	<b><del>[PROPOSED]</del> ORDER FOR</b>
	)	<b>EXTENSION OF TIME TO ANSWER</b>
MIRAMAX, LLC,	)	<b>OR OTHERWISE RESPOND TO THE</b>
	)	<b>COMPLAINT</b>
Defendant.	)	
	)	<b>(Fourth Request)</b>

Pursuant to Federal Rule of Civil Procedure 6(b)(1), LR 7-1(c), and LR IA 6-1, Plaintiff BMF Wallets, LLC and Defendant Miramax, LLC, hereby move this Court for a 14-day extension of time for Defendant to file and serve its answer or otherwise respond to the Complaint (ECF No. 1). This is the fourth request by the parties for such an extension.

Defendants were served with Plaintiff's Complaint on December 15, 2021. On December 21, 2021, the parties submitted a stipulated Motion for a 30-day extension of time for Defendant to response to the Complaint (ECF No. 6), which the Court granted on December 22, 2021 (ECF No. 7), setting a February 4, 2022, deadline for Defendant to answer or otherwise respond to the Complaint. On January 26, 2022, the parties submitted a second stipulated Motion for a 14-day extension of time for Defendant to response to the Complaint (ECF No. 8), which the Court granted on January 27, 2022 (ECF No. 8), setting a February 18, 2022, deadline for Defendant to answer or otherwise respond to the Complaint. On February 17, 2022, the parties submitted a third stipulated Motion for a 14-day extension of time for Defendant to response to the Complaint (ECF

1 No. 10), which the Court granted on February 18, 2022 (ECF No. 11), setting a March 4, 2022,  
2 deadline for Defendant to answer or otherwise respond to the Complaint.

3 The parties have been engaged in ongoing discussions regarding the terms and conditions  
4 of a settlement, which discussions have been delayed in part due to the holidays and the  
5 unavailability of certain persons employed by Defendant involved in the negotiations. An initial  
6 proposal was communicated by Defendant on December 27, 2021. Plaintiff responded to such  
7 proposal with its own counterproposal on January 5, 2022. On January 25, 2022, Plaintiff, through  
8 counsel, communicated terms and conditions of another settlement proposal. On February 7, 2022,  
9 Defendant, through counsel, responded to Plaintiff's settlement proposal by setting forth those areas  
10 where the parties were in accord and counterproposals for those terms and conditions that were  
11 not acceptable to Defendant. On February 16, 2022, Plaintiff, through counsel, responded to  
12 Defendant's last counterproposal by preparing a draft settlement agreement for Defendant's  
13 review. On February 24, 2022, Plaintiff, through counsel, emailed a revised version of the draft  
14 settlement agreement back to Defendant's counsel. On March 2, 2022, Defendant, through  
15 counsel, emailed a revised version of the draft settlement agreement back to Plaintiff's counsel.  
16 Plaintiff is in the process of reviewing Defendant's revisions and expects to respond within the  
17 next week.

18 In order to give the parties additional time to try and work out a settlement prior to moving  
19 forward with the case, the parties have agreed to give Defendant an additional 14-day extension of  
20 time to answer or otherwise respond to the Plaintiff's Complaint. For these reasons, this extension  
21 request is made for good cause and not for purposes of delay.

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1 For the foregoing reasons, the parties hereby stipulate and agree to extend the deadline for  
2 Defendant to answer or otherwise respond to the Complaint from March 4, 2022, to March 18,  
3 2022.

4  
5 Dated: March 2, 2022

6 Respectfully Submitted,

7 **GILE LAW GROUP, LTD.**

8 /s/ Ryan Gile

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13 Las Vegas, Nevada 89144

14 Tel. (702) 703-7288

15 *Attorney for Plaintiff BMF Wallets, LLC*

16 **IT IS SO ORDERED:**

17 

18 UNITED STATES MAGISTRATE JUDGE

19 DATED: March 3, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2022, I served a full, true and correct copy of the foregoing  
**STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT** via email on the following  
parties:

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/s/ Ryan Gile  
Employee, Gile Law Group Ltd.